

[APPEARANCES LISTED ON SIGNATURE  
PAGES]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

LEXAR MEDIA, INC. and ACCLAIM  
INNOVATIONS, LLC

Plaintiffs-Counterclaim  
Defendants,

v.

FUJI PHOTO FILM U.S.A., INC.,

Defendant-Counterclaim  
Plaintiff.

FUJI PHOTO FILM CO., LTD. and FUJI  
PHOTO FILM U.S.A., INC.

Plaintiffs-Counterclaim  
Defendants,

v.

LEXAR MEDIA, INC.,

Defendant-Counterclaim  
Plaintiff.

Case No. 03-CV-00355 MJJ

**STIPULATION TO STAY CASES;  
~~PROPOSED~~ ORDER**

Case No. C-06-01571 MJJ

1 WHEREAS currently pending before the Court is *Lexar Media, Inc. and Acclaim*  
2 *Innovations, LLC v. Fuji Photo Film U.S.A., Inc.*, Case No. 03-CV-00355 MJJ (the "Lexar Patent  
3 Action"), and *Fuji Photo Film Co., Ltd. and Fuji Photo Film U.S.A., Inc v. Lexar Media, Inc.*,  
4 Case No. C-06-01571 MJJ (the "Fuji Patent Action");

5 WHEREAS the parties have entered into a Memorandum Of Understanding  
6 ("MOU") resolving the Lexar Patent Action and the Fuji Patent Action, but the parties require  
7 additional time to draft final formal agreements and fulfill certain conditions of the MOU before  
8 these cases are dismissed:

9 IT IS HEREBY STIPULATED AND AGREED, by and between the parties in the  
10 above captioned actions, through their respective counsel undersigned, that:

11 The above-captioned litigations shall be stayed immediately until April 30, 2007 to  
12 allow the parties time to finalize all formal documents and perform all required conditions,  
13 including dismissals. All pending calendar deadlines are likewise suspended indefinitely.

14  
15 By his signature below, counsel for Lexar Media, Inc. and Acclaim Innovations,  
16 LLC attests under penalty of perjury that counsel for Fuji Photo Film Co., Ltd. and Fuji Photo  
17 Film U.S.A., Inc. concurs in the filing of this Stipulation.

1 Dated: March 13, 2007

/s/ Steven Cherensky

2 Matthew D. Powers (Bar No. 104795)  
3 E-Mail: matthew.powers@weil.com  
4 Steven S. Cherensky (Bar No. 168275)  
5 E-Mail: steven.cherensky@weil.com  
6 Rip Finst (Bar No. 234478)  
7 Email: rip.finst@weil.com  
8 WEIL, GOTSHAL & MANGES LLP  
201 Redwood Shores Parkway  
Redwood Shores, CA 94065  
Telephone: (650) 802-3000  
Facsimile: (650) 802-3100

9 Anita E. Kadala  
10 Email: anita.kadala@weil.com  
11 WEIL, GOTSHAL & MANGES LLP  
12 700 Louisiana, Suite 1600  
13 Houston, Texas 77002  
14 Telephone: (713) 546-5000  
15 Facsimile: (713) 224-9511  
16 Admitted *Pro Hac Vice*

17 Jonathan M. James  
18 Email: jjames@perkinscoie.com  
19 PERKINS COIE LLP  
20 2901 North Central Ave.  
21 Phoenix, AZ 85001-0400  
22 Telephone: (602) 351-8000  
23 Facsimile: (602) 351-7000

24 Stefani E. Shanberg  
25 Email: sshanberg@perkinscoie.com  
26 Dieter H. Hellmoldt  
27 Email: dhellmoldt@perkinscoie.com  
28 Lila I. Bailey  
Email: lbailey@perkinscoie.com  
PERKINS COIE LLP  
Four Embarcadero Ctr., Ste. 2400  
San Francisco, CA 94111  
Telephone: (415) 344-7000  
Facsimile: (415) 344-7050

Attorneys for LEXAR MEDIA, INC., and  
ACCLAIM INNOVATIONS, LLC

1 Dated: March 13, 2007

/s/ Jeffrey Sullivan

2 Matt Gonzalez (153486)  
3 G. Whitney Leigh (153457)  
4 Eumi K. Lee (209481)  
5 GONZALEZ & LEIGH, LLP  
6 Two Shaw Alley, Third Floor  
7 San Francisco, CA 94105  
8 Telephone: (415) 512-2000

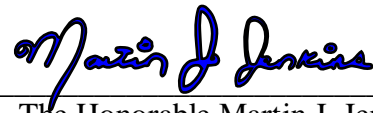
9 Robert C. Scheinfeld  
10 E-Mail: robert.scheinfeld@bakerbotts.com  
11 Jeffrey D. Sullivan  
12 E-Mail: jeffrey.sullivan@bakerbotts.com  
13 Eliot D. Williams  
14 E-Mail: eliot.williams@bakerbotts.com  
15 BAKER BOTTS, L.L.P.  
16 30 Rockefeller Plaza, 44th Floor  
17 New York, NY 10112  
18 Telephone: (212) 408-2500  
19 Facsimile: (212) 408-2501  
20 *Admitted Pro Hac Vice*

21 Attorneys for FUJI PHOTO FILM CO., LTD., and  
22 FUJI PHOTO FILM U.S.A., INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/14, 2007



The Honorable Martin J. Jenkins  
United States District Court Judge